



West Bengal State Electricity Distribution Company Limited

(A Government of West Bengal Enterprise)

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Regulation Cell

Memo No-REG/Legal/CERC/ 518

Dated: 16/03/2017

To
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001.


Sub: Comments on Draft Central Electricity Regulatory Commission (Cross Border Trade of Electricity) Regulations, 2017..

Respected Madam,

With reference to public notice dated 16.02.2017 on the above mentioned matters, comments/ suggestion of WBSEDCL are enclosed as Annexure-I for your consideration, please.

Encl: As above

Yours faithfully,

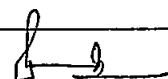

16/03/2017
(S. Mukhopadhyay)
Chief Engineer (Reg)

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Views of WBSEDCL on the Draft CERC Regulation of Cross border Trade of Electricity 2017

Clause No	As proposed in the Draft	Proposed change by WBSEDCL	Rational
19 (2)	In case PPA is signed for a duration of less than 7 years but more than 1 year with any entity in the target region sought in LTA application, there is no need to apply for MTOA separately. On furnishing PPA to CTU, energy shall be scheduled under Long term access as per provisions of PPAs but not earlier than 1 month after receipt of PPA..	In case PPA is signed for a duration of less than 7 years but more than 1 year with any entity in the target region sought in LTA application, there is no need to apply for MTOA separately. On furnishing PPA to CTU, energy shall be scheduled under Long Medium term access as per provisions validity of PPAs but not earlier than 1 month after receipt of PPA.	Under this clause Period of Long Medium Term Cross Border Open Access Consumers are treated at par with the period of domestic Medium Long Term open access consumers/ entity. It means LTA application of Cross Border will get priority over Domestic MTOA and as a result interest of domestic consumer will suffer.
14 (i)	<p>The application shall be made as per the provisions contained in CERC (Grant of Connectivity, Long Term & Medium Term Access) Regulations, 2009, as amended from time to time.</p> <p>Provided that if the quantum of electricity has not been firmed up in respect of the person to whom electricity is to be supplied or the source from which electricity is to be procured, the applicant shall indicate the quantum of electricity along with name of the Target Region(s) in which this electricity is proposed to be interchanged using the inter-State transmission system.</p> <p>Provided that in case such an application is made by an Indian entity, then the neighbouring country as a whole may be treated as a target region for the purposes of Cross Border Transmission Access.</p> <p>Provided that the implementation of the transmission system augmentation, if any, for grant of Cross Border Transmission Access shall be undertaken only after the signing of the Long Term PPA for at least fifty(50)</p>		<p>Para 2 (in bold) may be clarified that in case of limited corridor space a person/persons with valid PPA with target region would get priority over the person / persons who has no valid PPA with target region if both are applied for LTOA or MTOA irrespective of the application submission time stamping .</p> <p>Otherwise interest of domestic consumer will suffer.</p>


 16/3/2017
 Chief Engineer (Reg.)(Offtg.)
 Regulation Department
 WBSEDCL

Views of WBSEDCL on the Draft CERC Regulation of Cross border Trade of Electricity 2017

	percent of the installed capacity of the generating station by the applicant for the sale of electricity.		
30 (2)	Subject to provisions of the Grid Code and any other regulation specified by the Commission, the short-term access shall be curtailed first followed by the medium-term open access, which shall be followed by the long-term open access and amongst the accesses of a particular category, curtailment shall be carried out on pro rata basis	Subject to provisions of the Grid Code and any other regulation specified by the Commission, the cross boarder short-term access shall be curtailed first followed by the domestic short-term access ,which shall be followed by the medium-term open access, which shall be followed by the long-term open access and amongst the accesses of a particular category, curtailment shall be carried out on pro rata basis	In the event of curtailment , supply interest of domestic customer should have priority over cross border as far as STOA is concerned.


16/3/2017

Chief Engineer (Reg.)(Offtg.)
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